

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OSCAR LEE OLIVE, IV,

Plaintiff,

v.

HAYLEY MARIE ROBINSON, *et al.*,

Defendants.

Case No. 2:18-cv-00862-MJP

**ANSWER OF JUSTUS KEPPEL TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT FOR DAMAGES**

Defendant Justus Keppel ("Keppel") answers the Plaintiff's First Amended Complaint for Damages ("Complaint") as follows. Unless a factual allegation is explicitly admitted below, it is denied. Answers correspond to the numbered paragraphs of the Complaint.

I. ANSWER

1. Keppel lacks knowledge or information sufficient to form a belief about the truth of the allegations asserted in paragraph 1 and therefore denies them.

2. Admitted.

3. Admitted that this defendant's name is Justus Keppel and that he resides in Western Washington.

4. Keppel lacks knowledge or information sufficient to form a belief about the truth of the allegations asserted in paragraph 4 and therefore denies them.

1 5. Keppel lacks knowledge or information sufficient to form a belief about the
2 truth of the allegations asserted in paragraph 5 and therefore denies them.

3 6. Keppel lacks knowledge or information sufficient to form a belief about
4 plaintiff's residence, except that plaintiff is not a resident of Washington. Keppel admits that
5 this Court has diversity jurisdiction in this matter.

6 7. Admitted.

7 8. Admitted.

8 9. Keppel admits the first sentence but denies the balance of the allegations stated
9 in paragraph 9.

10 10. Denied.

11 11. Denied.

12 12. Denied.

13 13. Denied.

14 14. Denied.

15 15. Denied as to Keppel; Keppel lacks knowledge or information sufficient to form
16 a belief about the truth of the balance of the allegations asserted in paragraph 15 and therefore
17 denies them.

18 16. Denied.

19 17. Keppel lacks knowledge or information sufficient to form a belief about the
20 truth of the allegations asserted in paragraph 17 and therefore denies them.

21 18. Denied.

22 19. Keppel lacks knowledge or information sufficient to form a belief about the
23 truth of the allegations asserted in paragraph 19 and therefore denies them.

24 20. Denied.

25 21. Keppel incorporates his answers to paragraphs 1-20 as set forth above.

26 22. Denied.

27 23. Denied.

- 1 24. Denied.
- 2 25. Denied.
- 3 26. Keppel incorporates his answers to paragraphs 1-20 as set forth above.
- 4 27. Denied.
- 5 28. Denied.
- 6 29. Denied.
- 7 30. Denied.
- 8 31. Denied.
- 9 32. Denied.
- 10 33. Denied.
- 11 34. Paragraph 34 is not a factual allegation and therefore requires no answer.


12 **II. AFFIRMATIVE DEFENSES**

13 Keppel asserts the following affirmative defenses:

- 14 1. Some or all of plaintiff's claims are barred by applicable statutes of limitation.
- 15 2. Keppel reserves the right to assert other affirmative defenses as discovery
- 16 proceeds.

17 DATED this 19th day of September, 2018.

18 Law Offices of Alan S. Middleton PLLC
19 Attorneys for Justus Keppel

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CERTIFICATE OF SERVICE

Alan S. Middleton states:


I certify that on this day I served the foregoing on counsel and/or parties as follows:

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Dated this 19th day of September, 2018, at Renton, Washington.


Alan S. Middleton